

# **EPA Jacket 83529-85**

# PROCESSING REQUEST

Reg # 83529-85

Decision # 529731

Description: NEW PRODUCT

Electronic Label & Letter  
(see PPLS):

OR

Non Electronic  
Label & Letter  
(Scanning required):

☒ Dated: 10/12/17

☐ Dated:

\*\*\*Only one label type should be selected\*\*\*

Other Materials Sent (see jacket):

☒ New CSF(s) Dated: 5/19/17

☐ Other:

File this coversheet and attached materials in the jacket. It must be well organized and clipped together, NOT STAPLED. Then give the jacket with the coversheet and materials to staff in the Information Services Center (ISC) (Room S-4900). If a jacket is full or only available as an image, please file materials in a new jacket and bring it down to the (ISC). For further information please call 703-605-0716.

Reviewer: SARAH MEADOWS

Division: RD

Phone: 347-0505

Date: 11/30/17.



U.S. ENVIRONMENTAL PROTECTION AGENCY

Office of Pesticide Programs  
Registration Division (7505P)  
1200 Pennsylvania Ave., N.W.  
Washington, D.C. 20460

EPA Reg. Number:

83529-85

Date of Issuance:

10/12/17

NOTICE OF PESTICIDE:

☒ Registration  
☐ Reregistration  
(under FIFRA, as amended)

Term of Issuance:

Conditional

Name of Pesticide Product:

SHARDA ACETOCHLOR 33.7%  
+ DICHLORMID 5.8% CS

Name and Address of Registrant (include ZIP Code):

Sharda USA LLC  
c/o Wagner Regulatory Associates, Inc.  
PO Box 640, Hockessin, DE 19707

**Note:** Changes in labeling differing in substance from that accepted in connection with this registration must be submitted to and accepted by the Registration Division prior to use of the label in commerce. In any correspondence on this product always refer to the above EPA registration number.

On the basis of information furnished by the registrant, the above named pesticide is hereby registered under the Federal Insecticide, Fungicide and Rodenticide Act.

Registration is in no way to be construed as an endorsement or recommendation of this product by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with the Act. The acceptance of any name in connection with the registration of a product under this Act is not to be construed as giving the registrant a right to exclusive use of the name or to its use if it has been covered by others.

This product is conditionally registered in accordance with FIFRA section 3(c)(7)(A). You must comply with the following conditions:

1. Submit and/or cite all data required for registration/reregistration/registration review of your product under FIFRA when the Agency requires all registrants of similar products to submit such data.

Signature of Approving Official:

Debra Rate, Acting Product Manager 25  
Herbicide Branch, Registration Division (7505P)

Date:

10/12/17

2. You are required to comply with the data requirements described in the DCI identified below:

a. Acetochlor GDCI-121601-1660

You must comply with all of the data requirements within the established deadlines. If you have questions about the Generic DCI listed above, you may contact the Chemical Review Manager in the Pesticide Reevaluation Division: <http://iaspub.epa.gov/apex/pesticides/f?p=chemicalsearch:1>

3. Make the following label changes before you release the product for shipment:

- Revise the EPA Registration Number to read, "EPA Reg. No. 83529-85."

4. Submit one copy of the final printed label for the record before you release the product for shipment.

Should you wish to add/retain a reference to the company's website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance.

If you fail to satisfy these data requirements, EPA will consider appropriate regulatory action including, among other things, cancellation under FIFRA section 6(e). Your release for shipment of the product constitutes acceptance of these conditions. A stamped copy of the label is enclosed for your records. Please also note that the record for this product currently contains the following CSFs:

- Basic CSF dated 5/19/2017

If you have any questions, please contact Sarah Meadows by phone at 703-347-0505, or via email at [meadows.sarah@epa.gov](mailto:meadows.sarah@epa.gov).

Attachment



GROUP

15

HERBICIDE

# Sharda Acetochlor 33.7% + Dichlormid 5.8% CS

## ABN: Asset-S

For Use Only on Field Corn, Production Seed Corn, Silage Corn, Sweet Corn, and Popcorn

<b>ACTIVE INGREDIENT:</b>	<b>WT. BY %</b>
Acetochlor: 2-chloro-2'-methyl-6'-ethyl-N-ethoxymethylacetanilide .....	33.70%
<b>OTHER INGREDIENTS:</b> .....	66.30%
<b>TOTAL:</b> .....	100.00%
Contains 3.2 lbs./gal. of active ingredient.	

### KEEP OUT OF REACH OF CHILDREN

### CAUTION

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle.  
(If you do not understand this label, find someone to explain it to you in detail.)

FIRST AID	
<b>IF ON SKIN OR CLOTHING:</b>	<ul style="list-style-type: none"> <li>Take off contaminated clothing.</li> <li>Rinse skin immediately with plenty of water for 15-20 minutes.</li> <li>Call a poison control center or doctor for treatment advice.</li> </ul>
<b>IF IN EYES:</b>	<ul style="list-style-type: none"> <li>Hold eye open and rinse slowly and gently with water for 15-20 minutes.</li> <li>Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eyes.</li> <li>Call a poison control center or doctor for treatment advice.</li> </ul>
<b>IF SWALLOWED:</b>	<ul style="list-style-type: none"> <li>Call a poison control center or doctor immediately for treatment advice.</li> <li>Have person sip a glass of water if able to swallow.</li> <li>Do not induce vomiting unless told to do so by a poison control center or doctor.</li> <li>Do not give anything by mouth to an unconscious person.</li> </ul>
<b>IF INHALED:</b>	<ul style="list-style-type: none"> <li>Move person to fresh air.</li> <li>If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible.</li> <li>Call a poison control center or doctor for further treatment advice.</li> </ul>
HOTLINE NUMBER	
Have the product container or label with you when calling a poison control center or doctor or going for treatment. For emergency information concerning this product, call your poison control center at 1-800-222-1222.	

[Optional referral statements when booklets and container labels are used:

See Panel for First Aid Instructions and booklet for complete Precautionary Statements and Directions for Use.

See label booklet for complete Precautionary Statements, Directions For Use, and Storage and Disposal.

See label booklet for additional Precautionary Statements, Directions For Use, and Storage and Disposal.

See label booklet for complete Directions For Use.]

EPA Reg. No. 83529-IL

EPA Est. No. XXXXX-XX-XXX

Manufactured for:

**Sharda USA LLC** 

7217 Lancaster Pike, Suite A  
Hockessin, Delaware 19707

Net Contents: \_\_\_\_\_ Gals./L

**ACCEPTED**

10/12/2017

Under the Federal Insecticide, Fungicide  
and Rodenticide Act as amended, for the  
pesticide registered under  
EPA Reg. No. 83529-85

## PRECAUTIONARY STATEMENTS

### HAZARDS TO HUMANS AND DOMESTIC ANIMALS

#### CAUTION

Harmful if swallowed or absorbed through the skin. Avoid contact with skin, eyes or clothing. Prolonged or frequently repeated skin contact may cause allergic reaction in some individuals. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove and wash contaminated clothing before reuse.

#### PERSONAL PROTECTIVE EQUIPMENT (PPE)

**Applicators and other handlers must wear:**

- Long-sleeved shirt and long pants
- Chemical-resistant gloves made of barrier laminate, butyl rubber ≥14 mils, nitrile rubber ≥14 mils, neoprene rubber ≥14 mils, polyvinyl chloride (PVC) ≥14 mils, or Viton® ≥14 mils
- Shoes and socks

Discard clothing and other absorbent materials that have been drenched or heavily contaminated with this product's concentrate. Do not reuse them. Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables exist, use detergent and hot water. Keep and wash PPE separately from other laundry.

#### ENGINEERING CONTROL STATEMENT

When handlers use closed systems, enclosed cabs, or aircraft in a manner that meets the requirements listed in the Worker Protection Standard (WPS) for agricultural pesticides [40 CFR 170.240 (d)(4-6)], the handler PPE requirements may be reduced or modified as specified in the WPS.

#### USER SAFETY RECOMMENDATIONS

**Users should:**

- Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.
- Remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
- Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

#### ENVIRONMENTAL HAZARDS

This product is toxic to fish. Do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment wash water.

This chemical demonstrates the properties and characteristics associated with chemicals detected in groundwater. The use of this chemical in areas where soils are permeable, particularly where the groundwater is shallow, may result in groundwater contamination.

Acetochlor has properties that may result in surface water contamination via dissolved runoff and runoff erosion. Practices should be followed to minimize the potential for dissolved runoff and/or runoff erosion.

#### DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application. For any requirements specific to your State or Tribe, consult the agency responsible for pesticide regulation.

**Not for Use in Nassau and Suffolk Counties in New York State.**

#### AGRICULTURAL USE REQUIREMENTS

Use this product only in accordance with its labeling and with the Worker Protection Standard, 40 CFR Part 170. This Standard contains requirements for the protection of agricultural workers on farms, forests, nurseries, and greenhouses, and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification, and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this label about personal protective equipment (PPE), and restricted-entry interval. The requirements in this box only apply to uses of this product that are covered by the Worker Protection Standard.

**DO NOT** enter or allow worker entry into treated areas during the restricted-entry interval (REI) of **12 hours**.

**Exception:** If the product is soil-injected or soil-incorporated, the Worker Protection Standard, under certain circumstances, allows workers to enter the treated area if there will be no contact with anything that has been treated.

PPE required for early entry to treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, such as plants, soil, or water, is:

- Coveralls
- Chemical-resistant gloves made of barrier laminate, butyl rubber ≥14 mils, nitrile rubber ≥14 mils, neoprene rubber ≥14 mils, polyvinyl chloride (PVC) ≥14 mils, or Viton® ≥14 mils
- Shoes plus socks

## Meadows, Sarah

---

**From:** Anna Armstrong <Anna@wagnerreg.com>  
**Sent:** Thursday, October 12, 2017 11:24 AM  
**To:** Meadows, Sarah  
**Cc:** Kt Woodall; Anna Armstrong  
**Subject:** RE: EPA File Symbol 83529-IL  
**Attachments:** 83529-IL.20170519.V2 clean dnr.pdf; 83529-IL.20170519.V3 clean.pdf; 83529-IL.20170519.V3 highlighted.pdf

RESUBMISSION.

Hi Sarah,

Please find attached clean and highlighted copies of the label per your request. Please let me know if there is anything else you need.

Thanks so much for your efforts on this review.

Take care and have a great day!

Anna

---

**From:** Meadows, Sarah [mailto:Meadows.Sarah@epa.gov]  
**Sent:** Thursday, October 12, 2017 10:47 AM  
**To:** Anna Armstrong <Anna@wagnerreg.com>  
**Subject:** RE: EPA File Symbol 83529-IL

Hi, Anna. I am sorry to do this so last minute. We have one more edit that we'll need before we can stamp the label today. I had asked you to change the PPE to waterproof gloves, but I just found out that was incorrect. Please take a look at the attached and make this last change when you can.

Thank you!

Sarah

---

**From:** Anna Armstrong [mailto:Anna@wagnerreg.com]  
**Sent:** Tuesday, October 10, 2017 9:33 AM  
**To:** Meadows, Sarah <Meadows.Sarah@epa.gov>  
**Cc:** Kt Woodall <ktwoodall@wagnerreg.com>; Anna Armstrong <Anna@wagnerreg.com>  
**Subject:** RE: EPA File Symbol 83529-IL

Hi Sarah,

I hope you are well and had a nice holiday weekend.

Thanks so much for your efforts with this submission. Please find attached a clean copy of the label with revisions incorporated. I believe I have captured all of the revisions. If not, please let me know.

A couple of comments regarding the label:

- ABN: our client informed us of a typo in the ABN: Instead of "Assest" it should be "Asset". We had tried to inform them of this prior to submitting, but I don't believe they understood initially. At any rate, I have revised the ABN in the label, can you please also update accordingly? I apologize about this. I also included all the updated forms. The only thing I changed was the ABN from "Assest" to "Asset".
- The Restriction for Ground Water and Soil Restrictions box that is on the me-too label (and you had us add to other Acetochlor labels) was missing, so I added it in



- Page 9 of the label – I revised the phys chem information consistent with Sharda's phys chem data submitted in support of this registration.

Please let me know if you have any additional questions or comments.

Thanks so much and take care,

Anna

---

**From:** Meadows, Sarah [<mailto:Meadows.Sarah@epa.gov>]

**Sent:** Tuesday, October 3, 2017 11:46 AM

**To:** Anna Armstrong <[Anna@wagnerreg.com](mailto:Anna@wagnerreg.com)>

**Subject:** EPA File Symbol 83529-IL

Hi, Anna. I have attached our edits to this proposed product label. Please make these changes and send me a clean copy. Don't hesitate to let me know if you have any questions.

Thanks,

Sarah

Sarah True Meadows, PhD  
US Environmental Protection Agency  
Office of Pesticide Programs  
Registration Division - Herbicide Branch  
(703) 347-0505  
[meadows.sarah@epa.gov](mailto:meadows.sarah@epa.gov)



## Meadows, Sarah

---

**From:** Anna Armstrong <Anna@wagnerreg.com>  
**Sent:** Tuesday, October 10, 2017 9:33 AM  
**To:** Meadows, Sarah  
**Cc:** Kt Woodall; Anna Armstrong  
**Subject:** RE: EPA File Symbol 83529-IL  
**Attachments:** 83529-IL label edits dnr.pdf; 83529-XX Basic CSF - 19May2017.pdf; Certification Citation of Data EPA Form 8570-34.pdf; Cover Letter.doc.pdf; Data Matrix EPA Internal.doc.pdf; Data Matrix EPA Public.doc.pdf; Data Transmittal.doc.pdf; EPA app form.doc.pdf; Formulators Exemption 8570-27.pdf; Label Integrity Oct 10, 2017.pdf; 83529-IL.20170519.V2 clean.pdf

RESUBMISSION.

Hi Sarah,

I hope you are well and had a nice holiday weekend.

Thanks so much for your efforts with this submission. Please find attached a clean copy of the label with revisions incorporated. I believe I have captured all of the revisions. If not, please let me know.

A couple of comments regarding the label:

- ABN: our client informed us of a typo in the ABN: Instead of "Assest" it should be "Asset". We had tried to inform them of this prior to submitting, but I don't believe they understood initially. At any rate, I have revised the ABN in the label, can you please also update accordingly? I apologize about this. I also included all the updated forms. The only thing I changed was the ABN from "Assest" to "Asset".
- The Restriction for Ground Water and Soil Restrictions box that is on the me-too label (and you had us add to other Acetochlor labels) was missing, so I added it in
- Page 9 of the label – I revised the phys chem information consistent with Sharda's phys chem data submitted in support of this registration.

Please let me know if you have any additional questions or comments.

Thanks so much and take care,

Anna

---

**From:** Meadows, Sarah [mailto:Meadows.Sarah@epa.gov]

**Sent:** Tuesday, October 3, 2017 11:46 AM

**To:** Anna Armstrong <Anna@wagnerreg.com>

**Subject:** EPA File Symbol 83529-IL

Hi, Anna. I have attached our edits to this proposed product label. Please make these changes and send me a clean copy. Don't hesitate to let me know if you have any questions.

Thanks,

Sarah

Sarah True Meadows, PhD  
US Environmental Protection Agency  
Office of Pesticide Programs  
Registration Division - Herbicide Branch

# FEE



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION  
OFFICE OF PESTICIDE PROGRAMS REGISTRATION DIVISION (7505P)

## DOCUMENT CONTAINS CONFIDENTIAL BUSINESS INFORMATION

**DP BARCODE No.:** D441723; **FILE SYMBOL No.:** 83529-IL; **PRODUCT NAME:** Sharda Acetochlor 33.7%+Dichlormid 5.8% CS ABN: Assest-S; **DECISION No.:** 529731; **PC Code(s):** 121601; **ACTION CODE:** R300; **FOOD Use:** Yes; **COMPANY NAME:** Sharda USA LLC

**DATE OUT:** Aug 10, 2017

**SUBJECT:** End Use Product Chemistry Review

Product Name: Sharda Acetochlor 33.7% + Dichlormid 5.8% CS ABN: Assest-S

**FROM:** Santa K Vinjamuri  
Product Chemistry Team  
CITAB/RD (7505P))

*V Santa*  
*8/10/2017*

**Through:** Shyam Mathur, Ph.D.  
Chemistry Team Leader  
CITAB/RD (7505P)

*S Mathur*  
*8/10/17*

**TO:** Sarah Meadows /Reuben Baris, RM 25  
Herbicide Branch / RD (7505P)

## INTRODUCTION:

The registrant has submitted an application for the registration of the new end use product "Sharda Acetochlor 33.7% + Dichlormid 5.8% CS ABN: Assest". In support of the registration application, the registrant has submitted 830 series group A and group B product chemistry data with MRID No's. 502783 -01, -02, -03, & -04 and proposed product label. CITAB has been asked to determine acceptability of the data submitted and the proposed basic CSF (dated May 19<sup>th</sup> 2017), and the supporting product chemistry.

## SUMMARY OF FINDINGS:

1. Name of Active Ingredient(s): Acetochlor Technical (nominal = 33.7%)
2. Has the registrant claimed substantial similarity to a registered product?  
[X] Yes; [ ] No; [X] NA; if yes give the registration number of the cited product.

Reg No: 62719-369

**DP BARCODE No.:** ; **FILE SYMBOL No.:** 83529-IL; **P** **CT NAME:** Sharda  
Acetochlor 33.7%+Dicloromid 5.8% CS ABN: Assest-S; **DECISION No.:** 529731; **PC Code(s):**  
121601; **ACTION CODE:** R300; **FOOD Use:** Yes; **COMPANY NAME:** Sharda USA LL

3. All of the source materials of the active ingredient are derived from registered sources-  
☒ Yes ☐ No

4. All inert ingredients have been screened by CITAB (Inert Team) and found to be approved  
for the proposed label uses -  
☒ Yes; ☐ No.

5. Confidential Statement of Formula(s):

☒ Basic CSF - Dated: 05/19/2017; Re-submitted - Dated:

☐ Alternate CSF - Dated: ; Re-submitted – Dated:

Alternate CSF(s) complies with 40CFR§152.43: ☐ Yes; ☐ No; ☒ N

6. Product label

a. Ingredient statement: Nominal concentration of AI listed on CSF(s) concurs with  
product label (PR Notice 91-2).  
☒ Yes; ☐ No; if not, explain below:

Is the sub statement in compliance with PR Notice 97-6 (inert ingredient vs other  
ingredient)

☒ Yes; ☐ No; if not, explain below

Metallic equivalent: ☐ Yes ☒ NA;

Soluble arsenic: ☐ Yes ☒ NA

Isomeric ratios: ☐ Yes ☒ NA

Acid Equivalent: ☐ Yes ☒ NA; acid equivalent =

b. Health related sub statements: Product contains?

Petroleum distillate at > 10%: ☐ Yes; ☐ No; ☒ NA

Methanol at > 4%: ☐ Yes; ☐ No; ☒ NA

Sodium nitrate/sodium nitrite ☐ Yes; ☐ No; ☒ NA

c. Physical chemical hazard statement: Product label requires a statement per 40 CFR  
§156.78 for: flammability, explosive potential or electric insulator breakdown?  
☐ Yes ☒ No

Is the sub statement in compliance with PR Notice 98-6 (Total Release Fogger)?

☐ Yes; ☐ No; ☒ NA; if not, explain below

c. Label requires an additional Storage and Disposal statement:  
☐ Yes ☒ No; if yes explain below:

7. Group A: Product Chemistry Data

CITAB's determination of the acceptability for the proposed product is listed in the tables below.

Guideline No.	Study Title		Data submitted		CITAB's Assessment of Data	MRID Nos.
			Yes	No		
830.1550	Product Identity & Composition		X		A	50278301
830.1600	Description of materials used to produce the product		X		A	50278301
830.1650	Description of formulation process		X		A	50278301
830.1670	Discussion on the formation of impurities		X		A	50278301
830.1700	Preliminary analysis		X		A	50278301
830.1750	Certified limits (158.350)	Standard certified	X		A	50278301 Basic CSF Dt 5-19-2017
		Proposed Limits	X		A	
		Justification for wider limits				
830.1800	Enforcement analytical method <sup>1</sup>		X		A	50278302 HPLC with external standard quantification

A = Acceptance, N = Not Acceptable, G = Data Gap, W = Waiver Request, I = In Progress, NA = Not Applicable; U = Upgradeable.

1. If validation of analytical method is not provided, the data requirements should be "N" (Not Acceptable)



8. Group B:

Guideline No.	Study Title	Value or Qualitative Description	CITAB's Assessment of Data	MRID Nos.
830.6303	Physical State	liquid	A	50278302
830.6302	Color	White	A	50278302
830.6314	Oxidation/Reduction	Compatible with water, fire extinguishing agents, reducing agents, oxidizing agents and Ammonium dihydrogen phosphate.	A	50278303
830.6315	Flammability	Nonflammable > 100 °C	A	50278303
830.6316	Explosibility	Waiver request for the data requirement is justified as the product does not contain any ingredients that will self-ignite nor it is highly flammable. A flashpoint study was conducted and showed that the product is non-flammable and has a flashpoint of greater than 100 °C.	A	50278304
830.7000	pH	6.1 at 21.4 °C., before accelerated storage. 5.1 at 21.6 °C., after accelerated storage	A	50278302
830.7100	Viscosity	At 20 °C - 253.07 – 617.87 cP and at 40 °C was 165.71 – 500.89cP	A	50278302
830.7300	Density (units)	1.0706 ± 0.0113	A	50278302
830.6317	Storage stability Or Accelerated storage stability	Stable-There was no significant reduction in the weight with respect to the initial value; a weight variation of less than 1% at 54 °C ± 2 °C.	A	50278302
830.6320	Corrosion characteristics or Accelerated corrosion	Non corrosive in Aluminium, Polyethylene (PE) & Zinc. Corrosive in Copper & Iron.	A	50278302

A = Acceptance, N = Not Acceptable, G = Data Gap, W = Waiver request, NA = Not applicable, I = In progress; U = Upgradeable

## CONCLUSIONS:

CITAB has reviewed the product chemistry data submitted/cited for the end-use product and has concluded that:

### Substantial similarity to the cited product (Reg No: 62719-369)

- ☒ Similar
- ☐ Not similar, give reasons
- ☐ Identical
- ☐ Not identical
- ☐ Not applicable

#### A. Confidential Statement of formula

##### 1. Basic CSF (dated 05/19/2017)

- ☒ Acceptable
- ☐ Not Acceptable
- ☐ Not Applicable

If not acceptable provide the reasons

##### 2. Alternate CSF (dated)

- ☐ Acceptable
- ☐ Not Acceptable
- ☒ Not Applicable

If not acceptable give reasons

#### B. Group A Product Chemistry Data

- ☒ Acceptable
- ☐ Not acceptable
- ☐ Acceptable with the exception of Guideline
- ☐ Not required
- ☐ Data cited

#### C. Group B Product chemistry data

- ☒ Acceptable
- ☐ Not acceptable
- ☐ Acceptable with the exception of guidelines
- ☐ Not required
- ☐ Data cited
- ☒ Waiver request ☒ Acceptable ☐ Not acceptable ☐ Not Applicable

#### D. Product Label/Draft Label

Recommendations – Yes ☒; No ☐



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY AND  
POLLUTION PREVENTION

OFFICE OF PESTICIDE PROGRAMS  
REGISTRATION DIVISION

15/JUN/2017

Subject: Name of Pesticide Product: Sharda Acetochlor 33.7% Acetochlor + Dichlormid  
5.8% CS  
EPA Reg. No. /File Symbol: 83529-IL  
DP Barcode: D440781  
Decision No: 529731  
Action Code: R300  
PC Code: 121601 (acetochlor)

From: Eugenia McAndrew, Biologist *Eugenia McAndrew*  
Chemistry, Inerts and Toxicology Assessment Branch  
Registration Division (7505P)

Through: P.V. Shah, PhD, Chief *P.V. Shah*  
Chemistry, Inerts and Toxicology Assessment Branch *6/15/2017*  
Registration Division (7505P)

To: Reuben Baris, Risk Manager Team 25  
Herbicide Branch  
Registration Division (7505P)

Applicant: Sharda USA LLC  
c/o Wagner Regulatory Associates, Inc.  
P.O. Box 640  
Hockessin, DE 19707

FORMULATION FROM LABEL:

<u>Active Ingredient(s):</u>	<u>% by wt.</u>
Acetochlor	33.68
Other ingredients:	<u>66.32</u>
Total:	100.00

**ACTION REQUESTED:** Similarity determination for 83529-IL, proposed product, and 62719-369, cited product.

**BACKGROUND:** Sharda USA LLC has applied for registration of Sharda Acetochlor 33.7% Acetochlor + Dichlormid 5.8% CS, EPA File Symbol 83529-IL, claiming to be substantially similar to Top Notch Herbicide, EPA Reg. No. 62719-369 (transferred from 10182-391). Both products contain 33.68% acetochlor. The submission includes a basic CSF dated May 19, 2017, label, data matrix and company letter.

The registrant is using the cite all method of data support to satisfy the acute toxicity data requirements. A search of the OPP electronic databases shows that acute toxicity studies were submitted to support the registration of the cited product, 62719- 369. These studies were reviewed and an acute toxicity profile was assigned to 62719-369 in two Registration Support Branch/Registration Division memos in 1995 (Blackwell; EPA File Symbol 10182-GOR; 17/JAN/1995 and Blackwell; EPA File Symbol 10182-GOR; 02/FEB/1995).

#### **RECOMMENDATIONS:**

1. We compared the basic CSFs and labels of the proposed product, 83529-IL, and the cited product, 62719-369, and determined that the two products are substantially similar.

2. The acute toxicity profile for the proposed product, Sharda Acetochlor 33.7% Acetochlor + Dichlormid 5.8% CS, EPA File Symbol 83529-IL, based on 62719-369, is as follows:

acute oral toxicity	III	cited	EPA Reg. No. 62719-369
acute dermal toxicity	III	cited	EPA Reg. No. 62719-369
acute inhalation toxicity	IV	waived	EPA Reg. No. 62719-369
primary eye irritation	IV	cited	EPA Reg. No. 62719-369
primary skin irritation	IV	cited	EPA Reg. No. 62719-369
dermal sensitization	pos.	cited	EPA Reg. No. 62719-369

3. The proposed basic CSF submitted for 83529-IL must be reviewed and accepted by the product chemists in the Chemistry, Inerts and Toxicology Assessment Branch.



**LABELING:** Based on the toxicity profile above, the following are the precautionary and first aid statements for this product as obtained from the Label Review System:

**PRODUCT ID #:** 083529-IL

**PRODUCT NAME:** Sharda Acetochlor 33.7% + Dichlormid 5.8% CS

**PRECAUTIONARY STATEMENTS**

**SIGNAL WORD:** CAUTION

**Hazards to Humans and Domestic Animals:**

Harmful if swallowed. Harmful if absorbed through skin. Avoid contact with skin, eyes or clothing. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove and wash contaminated clothing before reuse. Wear: Long-sleeved shirt and long pants, socks, shoes, and waterproof gloves.

**First Aid:**

If swallowed:

- Call a poison control center or doctor immediately for treatment advice.
- Have person sip a glass of water if able to swallow.
- Do not induce vomiting unless told to by a poison control center or doctor.
- Do not give anything to an unconscious person.

If on skin:

- Take off contaminated clothing.
- Rinse skin immediately with plenty of water for 15-20 minutes.
- Call a poison control center or doctor for treatment advice.

Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact 1-800-xxx-xxxx for emergency medical treatment information.

**User Safety Recommendations:**

Users should:

- Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.
- Remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
- Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change clothing.

*\*Product ingredient source information may be entitled to confidential treatment\**  
*\*Inert ingredient information may be entitled to confidential treatment\**

**From:** Sheahin, Marc [mailto:Sheahin.Marc@epa.gov]  
**Sent:** Monday, June 5, 2017 2:04 PM  
**To:** Anna Armstrong <Anna@wagnerreg.com>  
**Subject:** Application for EPA Reg.# 83529-IL - Confidential

Dear Ms. Armstrong,

My name is Marc Sheahin and I am a contractor with the EPA. I am contacting you in regards to your submission in support of Sharda Acetochlor 33.7% + Dichlormid 5.8% CS ABN: Asset-S (EPA Reg. Number: 91889-G). We have found a deficiency with the submission that will need to be addressed:

1. Inert ingredients listed on the CSF were not found in the Agency database. Please refer to the attachment for more information.

*Please send all necessary documents to this e-mail address by 06/07. After that time, please send directly to the PM. If you have any questions, please do not hesitate to contact me.*

Best,  
Marc Sheahin

Contractor, US EPA  
2777 S. Crystal Drive, S-4811  
Arlington, VA 22202  
(703) 347-8686  
Email: [sheahin.marc@epa.gov](mailto:sheahin.marc@epa.gov)

Submitted Electronically

May 19, 2017

Document Processing Desk (REGFEE)  
Attn: Reuben Baris, PM 25  
Registration Division  
U.S. Environmental Protection Agency  
Office of Pesticide Programs (7505P)  
Room S-4900, One Potomac Yard  
2777 South Crystal Drive  
Arlington, Virginia 22202-4501



Wagner Regulatory Associates, Inc.  
P.O. Box 640  
7217 Lancaster Pike, Suite A  
Hockessin, Delaware 19707

**Subject: Sharda Acetochlor 33.7% + Dichlormid 5.8% CS ABN: Asset-S**  
**EPA Company No. 83529**  
**Application to register a new end-use product - (PRIA R300)**

Dear Mr. Baris:

Wagner Regulatory Associates, Inc., as agent for Sharda USA LLC, is requesting registration of the above referenced product. In support of this request, the following documents and studies are being submitted electronically via the EPA CDX PSP portal.

- Letter from Sharda USA LLC appointing Wagner Regulatory Associates, Inc. as its agent
- Application for Pesticide Registration (8570-1)
- Confidential Statement of Formula (8570-4)
- Certification with Respect to Citation of Data (8570-34)
- Data Matrix (8570-35), internal and public versions
- Data Transmittal Document
- Formulators Exemption (8570-27)
- Data as outlined in the transmittal document
- Draft label
- Certification with Respect to Label Integrity
- Receipt confirming payment of fee for PRIA R300 - \$1,582.

Thank you in advance for your efforts in reviewing this submission. Please do not hesitate to contact me by email at [anna@wagnerreg.com](mailto:anna@wagnerreg.com) or by phone at 302-510-0039 should you have any questions.

Respectfully submitted,

Anna Armstrong  
Agent for Sharda USA LLC

Enclosures



**DATA TRANSMITTAL DOCUMENT**

1. **Name and Address of Submitter**  
Sharda USA LLC  
c/o Wagner Regulatory Associates, Inc.  
P.O. Box 640  
Hockessin, DE 19707
2. **Regulatory Action In Support Of Which This Package Is Submitted**  
Application for New Registration  
**Sharda Acetochlor 33.7% + Dichlormid 5.8% CS ABN: Asset-S**
3. **Transmittal Date**  
May 19, 2017
4. **List of Submitted Studies**

50278301	Sharda Acetochlor 33.7% + Dichlormid 5.8% CS Product Identity and Composition, Description of Materials, Description of Formulation Process, Preliminary Analysis, Discussion of Impurities, and Certified Limits. OPPTS 830.1550, 830.1600, 830.1650, 830.1670, 830.1700, 830.1750
50278302	Acetochlor 33.7 % + Dichlormid 5.8 % CS - Physical-Chemical Properties and Accelerated Storage Study, Study No. E16157, OPPTS: 830.1800, 830.6302, 830.6303, 830.6304, 830.6313, 830.6317, 830.6320, 830.7000, 830.7100, 830.7300, 830.7520
50278303	Acetochlor 33.7 % + Dichlormid 5.8 % CS - Flash Point And Oxidizing Properties, Study No. E17040, OPPTS: 830.6314, 830.6315
50278304	Sharda Acetochlor 33.7% + Dichlormid 5.8% CS Product Chemistry – Group B: Request for Waiver for Certain Physical/Chemical Properties Data. OPPTS 830.6313; 830.6316; 830.6319; 830.6321; 830.7050; 830.7200; 830.7220; 830.7370; 830.7520; 830.7550; 830.7560; 830.7570; 830.7840; 830.7860; 830.7950

**Company Official:**

Anna Armstrong  
**Authorized Agent**

  
**Signature**

**Company Name:** Sharda USA LLC**Company Contact:**

Anna Armstrong  
**Authorized Agent**

(302) 510-0039  
**Phone**



United States  
**Environmental Protection Agency**  
 Washington, DC 20460

☒ **Registration**

OPP Identifier Number

☐ **Amendment**
☐ **Other**

### Application for Pesticide - Section I

1. Company/Product Number 83529-XX	2. EPA Product Manager Reuben Baris	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Sharda USA LLC / Sharda Acetochlor 33.7% + Dichlormid 5.8% CS ABN: Asset-S	PM# 25	
5. Name and Address of Applicant (Include Zip Code)  Sharda USA LLC c/o Wagner Regulatory Associates, Inc. P.O. Box 640 Hockessin, DE 19707 <input type="checkbox"/> Check if this is a new address	6. <b>Expedited Review.</b> In accordance with FIFRA Section 3(c)(3) (b)(I), my product is similar or identical in composition and labeling to: EPA Reg. No. 62719-369 Product Name: TopNotch Herbicide	

### Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input checked="" type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

**Explanation:** Use additional page(s) if necessary. (For Section I and Section II.)  
 PRIA Code - R300

### Section - III

1. <b>Material This Product Will Be Packaged In:</b>			
Child-Resistant Packaging <input type="checkbox"/> Yes* <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes" No. per Unit Packaging wgt. container	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes" No. per Package wgt. container	2. Type of Container <input type="checkbox"/> Metal <input checked="" type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) HDPE lined bags
* <b>Certification must be submitted</b>			
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container	4. Size(s) Retail Container 2gal; 2.5 gal x 2; 5gal; 10gal; 110gal, 265gal, Bulk, Totes	5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Other _____ <input checked="" type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled			

### Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name Anna Armstrong	Title Agent for Sharda USA LLC	Telephone No. (Include Area Code) (302)-510-0039 (anna@wagnerreg.com)
<b>Certification</b> I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received  <b>(Stamped)</b>
2. Signature 	3. Title Agent for Sharda USA LLC	
4. Typed Name Anna Armstrong	5. Date May 19, 2017	



United States  
Environmental Protection Agency  
Washington, DC 20460  
**Formulator's Exemption Statement**  
(40 CFR 152.85)

Applicant's Name and Address  Sharda USA LLC c/o Wagner Regulatory Associates, Inc. P.O. Box 640 Hockessin, DE 19707	EPA File Symbol/Registration Number 83529-XX
	Product Name Sharda Acetochlor 33.7% + Dichlormid 5.8% CS ABN: Asset-S
	Date of Confidential Statement of Formula (EPA Form 8570-4) 05/19/2017

As an authorized representative of the applicant for registration of the product identified above, I certify that:

(1) This product contains the following active ingredient(s):

Acetochlor

(2) Of these, each active ingredient listed in paragraph (4) is present solely as the result of the use of that active ingredient in the manufacturing, formulation or repackaging another product which contains that active ingredient which is registered under FIFRA Section 3, is purchased by us from another person and meets the requirements of 40 CFR section 158.50(e)(2) or (3).

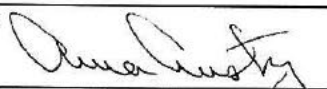
(3) Indicate by checking (A) or (B) below which paragraph applies:

☒ (A) An accurate Confidential Statement of Formula (EPA FORM 8570-4) for the above identified product is attached to this statement. That formula statement indicates, by company name, registration number, and product name, the source of the active ingredient(s) listed in paragraph (1).

OR

☐ (B) The Confidential Statement of Formula (CSF)(EPA Form 8570-4) referenced above and on file with the EPA is complete, current, an accurate and contains the information required on the current CSF.

(4) The following active ingredients in this product qualify for the formulator's exemption.

Source		
Active Ingredient	Product Name	Registration Number
Acetochlor	[REDACTED]	[REDACTED]
Signature 	Name and Title Anna Armstrong, Agent	Date 05/19/2017





## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Form Approved OMB No. 2070-0060


401 M Street, S.W.  
WASHINGTON, D.C. 20460

**Paperwork Reduction Act Notice:** The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for reregistration and special review activities, including time for reading the instruction and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137), U.S. Environmental Protection Agency, 401 M Street, S.W., Washington DC 20460. Do not send the form to this address.

## DATA MATRIX

Date: May 19, 2017	EPA Reg No./ File Symbol: 83529-XX	Page 1 of 2
Applicant's/Registrant's Name and Address: Sharda USA LLC c/o Wagner Regulatory Associates Inc. P.O. Box 640 Hockessin, DE 19707	Product: Sharda Acetochlor 33.7% + Dichlormid 5.8% CS ABN: Asset-S	
Ingredient: Acetochlor		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
<b>PRODUCT SPECIFIC</b>					
830.1550, 830.1600, 830.1650, 830.1670, 830.1750	Product Identity & Composition/ Description of Materials used to Produce the Product/Description of Formulation Process/Discussion of Formation and Toxicity of Impurities, Certified Limits	50278301	Sharda USA LLC	Own	
830.1700	Preliminary Analysis	50278301	Sharda USA LLC	Own	
830.1800	Enforcement Analytical Method	50278302	Sharda USA LLC	Own	
830.6302	Color	50278302	Sharda USA LLC	Own	
830.6303	Physical State	50278302	Sharda USA LLC	Own	
830.6304	Odor	50278302	Sharda USA LLC	Own	
830.6313	Stability to Normal & Elevated Temperatures	50278302 50278304	Sharda USA LLC	Own	
830.6314	Oxidation/Reduction	50278303	Sharda USA LLC	Own	
830.6315	Flammability	50278303	Sharda USA LLC	Own	
830.6316	Explosibility	50278304	Sharda USA LLC	Own	
830.6317	Storage Stability	50278302	Sharda USA LLC	Own	
830.6319	Miscibility	50278304	Sharda USA LLC	Own	
830.6320	Corrosion Characteristics	50278302	Sharda USA LLC	Own	
830.6321	Dielectric breakdown voltage	50278304	Sharda USA LLC	Own	
830.7000	pH	50278302	Sharda USA LLC	Own	
830.7050	UV/Visible Light Absorption	50278304	Sharda USA LLC	Own	
830.7100	Viscosity	50278302	Sharda USA LLC	Own	
830.7200	Melting Point	50278304	Sharda USA LLC	Own	
830.7220	Boiling Point	50278304	Sharda USA LLC	Own	
830.7300	Density/Relative Density	50278302	Sharda USA LLC	Own	
830.7370	Dissociation Constant in Water	50278304	Sharda USA LLC	Own	

Signature 	Name and Title Anna Armstrong, Agent	Date May 19, 2017
--	---	----------------------





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
401 M Street, S.W.  
WASHINGTON, D.C. 20460

Form Approved OMB No. 2070-0060


**Paperwork Reduction Act Notice:** The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for reregistration and special review activities, including time for reading the instruction and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137), U.S. Environmental Protection Agency, 401 M Street, S.W., Washington DC 20460. Do not send the form to this address.

**DATA MATRIX**

Date: May 19, 2017	EPA Reg No./ File Symbol: 83529-XX	Page 2 of 2
Applicant's/Registrant's Name and Address: Sharda USA LLC c/o Wagner Regulatory Associates Inc. P.O. Box 640 Hockessin, DE 19707	Product: <b>Sharda Acetochlor 33.7% + Dichlormid 5.8% CS ABN: Asset-S</b>	
Ingredient: Acetochlor		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.7520	Particle Size, fiber length & diameter distribution	50278304	Sharda USA LLC	Own	
830.7550; 7560; 7570	Partition Coefficient (n-Octanol/Water)	50278304	Sharda USA LLC	Own	
830.7840; 7860	Water Solubility/Solubility in Organic Solvents	50278304	Sharda USA LLC	Own	
830.7950	Vapor Pressure	50278304	Sharda USA LLC	Own	
870.1100	Acute Oral Toxicity	CITE ALL	E.I. DuPont Nemours, Wilmington, DE	Pay	
870.1200	Acute Dermal Toxicity		Monsanto Company, Washington, DC		
870.1300	Acute Inhalation Toxicity		Gowan Comp, Yuma, AZ		
870.2400	Primary Eye Irritation		Adama Agan, Raleigh, NC		
870.2500	Primary Dermal Irritation		Drexel Chemical Company, Memphis, TN		
870.2600	Dermal Sensitization		Loveland Products Inc, Greeley, CO		
			Albaugh LLC, Valdosta, GA		
			Dow Agrosciences LLC, Indianapolis, IN		
			Makhteshim Agan of N.A., Raleigh, NC		
			Monsanto Company, Washington, DC		
			Spray Drift Task Force, Washington, DC		
			Outdoor Residential Exp. Task Force, Wash, DC		
			Ag. Reentry Task Force, Washington, DC		
			FIFRA Endangered Species Task Force, Lakewood, WA		
			Ag. Handler Exposure Task Force, Macon, MO		
			Generic Endangered Species Task Force, Gig Harbor, WA		

Footnotes:

Signature 	Name and Title Anna Armstrong, Agent	Date May 19, 2017
--	---	----------------------



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
**1200 Pennsylvania Avenue, N.W.**  
**WASHINGTON, D.C. 20460**

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 1.25 hours per response for registration and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, Collection Strategies Division (2822T), U.S. Environmental Protection Agency, 1200 Pennsylvania Avenue, N.W., Washington, DC 20460. Do not send the completed form to this address.

**Certification with Respect to Citation of Data**

Applicant's/Registrant's Name, Address, and Telephone Number Sharda USA LLC, P.O. Box 640, Hockessin, DE 19707	EPA Registration Number/File Symbol 83529-XX
Active Ingredient(s) and/or representative test compound(s) Acetochlor	Date May 19, 2017
General Use Pattern(s) (list all those claimed for this product using 40 CFR Part 158) Terrestrial food Crops	Product Name Sharda Acetochlor 33.7% + Dichlorimid 5.6% CS ABN: Asset-S

**NOTE:** If your product is a 100% repackaging of another purchased EPA-registered product labeled for all the same uses on your label, you do not need to submit this form. You must submit the Formulator's Exemption Statement (EPA Form 8570-27).

☐ I am responding to a Data-Call-In Notice, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).

**SECTION I: METHOD OF DATA SUPPORT (Check one method only)**

☐ I am using the cite-all method of support, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).

☒ I am using the selective method of support (or cite-all option under the selective method), and have included with this form a completed list of data requirements (the Data Matrix form must be used).

**SECTION II: GENERAL OFFER TO PAY**

[Required if using the cite-all method or when using the cite-all option under the selective method to satisfy one or more data requirements]

☒ I hereby offer and agree to pay compensation, to other persons, with regard to the approval of this application, to the extent required by FIFRA.

**SECTION III: CERTIFICATION**

I certify that this application for registration, this form for reregistration, or this Data-Call-In response is supported by all data submitted or cited in the application for registration, the form for reregistration, or the Data-Call-In response. In addition, if the cite-all option or cite-all option under the selective method is indicated in Section I, this application is supported by all data in the Agency's files that (1) concern the properties or effects of this product or an identical or substantially similar product, or one or more of the ingredients in this product; and (2) is a type of data that would be required to be submitted under the data requirements in effect on the date of approval of this application if the application sought the initial registration of a product of identical or similar composition and uses.

I certify that for each exclusive use study cited in support of this registration or reregistration, that I am the original data submitter or that I have obtained the written permission of the original data submitter to cite that study.

I certify that for each study cited in support of this registration or reregistration that is not an exclusive use study, either: (a) I am the original data submitter; (b) I have obtained the permission of the original data submitter to use the study in support of this application; (c) all periods of eligibility for compensation have expired for the study; (d) the study is in the public literature; or (e) I have notified in writing the company that submitted the study and have offered (i) to pay compensation to the extent required by sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA; and (ii) to commence negotiations to determine the amount and terms of compensation, if any, to be paid for the use of the study.

I certify that in all instances where an offer of compensation is required, copies of all offers to pay compensation and evidence of their delivery in accordance with sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA are available and will be submitted to the Agency upon request. Should I fail to produce such evidence to the Agency upon request, I understand that the Agency may initiate action to deny, cancel or suspend the registration of my product in conformity with FIFRA.

I certify that the statements I have made on this form and all attachments to it are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

Signature

*Anna Armstrong*

Date

05/19/2017

Typed or Printed Name and Title

Anna Armstrong, Agent





## INERT CLEARANCE STATUS FORM

Reviewer Name: Marc Sheahin			Request Date: 06/05/2017
Tel: 703-347-8686	ISB	CUBE: S-4811	MAIL CODE: 7502P

### A. COMMENTS:

Inert Issue
-------------

### B. PESTICIDE PRODUCT INFORMATION:

Receipt Number: 1003869	Date on CSF: 06/05/2017	Food-Use Pesticide: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
EPA Reg. No/File Symbol: 83529-IL	Formulation: Basic	

### C. INGREDIENT INFORMATION:

Ingredient No.1	Tolerance Exemption(s) <sup>1</sup>					
	910	920	930	940	950	960
Chem. Name: [REDACTED]	OK	mon	A. Debever	6.14.17		
Trade Name: [REDACTED]						
CAS Reg. No: [REDACTED]						
Comments: Not found in the Agency database. Please provide full compositional information including the manufacturer constituent names, CAS numbers, and weight/weight percent composition and a letter of approval from the supplier.						

#### Ingredient No. 2

Chem. Name:						
Trade Name:						
CAS Reg.:						
Comments:						

Reviewer Name: Marc Sheahin

Review Date: 06/05/2017

<sup>1</sup>Language from the Code of Federal Regulations (40 CFR 180, subpart D):

40 CFR 180.910: Inert ingredients used pre- and post-harvest; 40 CFR 180.920: Inert ingredients used pre-harvest; 40 CFR 180.930: Inert ingredients applied to animals; 40 CFR 180.940: Tolerance exemptions for active and inert ingredients for use in antimicrobial formulations; 40 CFR 180.950: Tolerance exemptions for minimal risk active and inert ingredients; and 40 CFR 180.960: Polymers.